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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC.

CASE NO. 3:17-cv-00939-WHA

Plaintiff.

VS

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC.

**DECLARATION OF JOHN MCCUALEY
IN SUPPORT OF PLAINTIFF WAYMO
RESPONSE TO ORDER REGARDING
LETTER FROM UNITED STATES
ATTORNEY (DKT. 2261)**

Defendants

1 I, John McCauley, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), counsel for Plaintiff Waymo LLC
4 ("Waymo"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of a document bearing bates
7 number UBER00326333.

8 3. Attached as Exhibit 2 is a true and correct copy of a November 24, 2017 letter from
9 David Perlson to Karen Dunn, Arturo Gonzalez, and Bill Carmody, counsel for Uber and
10 Ottomotto.

11 4. Attached as Exhibit 3 is a true and correct copy of a November 25, 2017 email
12 from James Judah to Special Master John Cooper and all counsel for Uber and Ottomotto.

13 5. Attached as Exhibit 4 is a true and correct copy of a November 25, 2017 email
14 from Arturo Gonzalez to James Judah.

15 6. Attached as Exhibit 5 is a true and correct copy of the Declaration of James Judah
16 in support of Waymo's Response to Order Regarding Letter from United States Attorney.

17 7. Attached as Exhibit 6 is a true and correct copy of Uber's Response to Judge
18 Alsup's Order Regarding April 5, 2017 Discovery Hearing (Dkt. 144.)

19 8. Attached as Exhibit 7 is a true and correct copy of excerpts from the October 2,
20 2017 deposition of Angela Padilla.

21 9. Attached as Exhibit 8 is a true and correct copy of a November 24, 2017 email
22 from David Perlson to Special Master John Cooper and all counsel for Uber and Ottomotto.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 DATED: November 27, 2017

26 /s/ John McCauley
John McCauley

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1 **SIGNATURE ATTESTATION**

2 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
3 filing of this document has been obtained from John McCauley.

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5 */s/ Charles K. Verhoeven*
6 Charles K. Verhoeven
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